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E-FILED: 5/20/2015
JS-6

Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DISTRICT

| | | |
|-------------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, |) | NO. CV 15-634 PSG (FFMx) |
| |) | |
| Plaintiff, |) | |
| |) | [PROPOSED] |
| v. |) | |
| |) | CONSENT JUDGMENT OF FORFEITURE |
| \$20,355.00 IN U.S. CURRENCY, |) | |
| |) | |
| Defendant. |) | |
| |) | |

Plaintiff and Jereyl Willis ("Willis") have made a stipulated request for the entry of this Consent Judgment, resolving this action in its entirety.

The Court, having considered the stipulation of the parties, and good cause appearing therefor, HEREBY ORDERS, ADJUDGES AND DECREES:

1 1. This Court has jurisdiction over the parties and the
2 subject matter of this action.

3 2. The government has given and published notice of this
4 action as required by law, including Supplemental Rule G for
5 Admiralty or Maritime Claims and Asset Forfeiture Actions,
6 Federal Rules of Civil Procedure, and the Local Rules of this
7 Court. No claims or answers have been filed and the time for
8 filing claims and answers has expired. All potential claimants
9 to the defendant currency other than Willis are deemed to have
10 admitted the allegations of the Complaint. The allegations set
11 out in the Complaint are sufficient to establish a basis for
12 forfeiture. The government has agreed to recognize the interest
13 of Willis as set out below.

14 3. \$4,000.00 of the defendant \$20,355.00 shall be
15 returned to Willis through his counsel. The United States
16 Marshals Service shall release said funds, without interest, by
17 wire transfer to Willis' counsel, who shall provide the
18 information necessary to make the wire transfer (including bank
19 account and routing information) forthwith. The United States
20 Marshals Service shall make the transfer within 45 days of the
21 entry of this judgment or its receipt of the necessary wire
22 transfer information, whichever is later.

23 4. The government shall have judgment as to the remaining
24 \$16,355.00 in U.S. currency, and no other right, title or
25 interest shall exist therein. The government shall dispose of
26 the forfeited currency according to law.

27 5. Willis has agreed to release the United States of
28 America, its agencies, agents, and officers, including employees

1 and agents of the Drug Enforcement Administration, from any and
2 all claims, actions or liabilities arising out of or related to
3 the seizure and retention of the defendant currency and/or the
4 commencement of this civil forfeiture action, including, without
5 limitation, any claim for attorneys' fees or costs which may be
6 asserted on behalf of Willis against the United States, whether
7 pursuant to 28 U.S.C. § 2465 or otherwise.

8 6. The Court finds that there was reasonable cause for
9 the seizure of the defendant currency and the institution of
10 this action. This consent judgment shall be construed as a
11 certificate of reasonable cause pursuant to 28 U.S.C. § 2465.

12 7. Each of the parties shall bear its own fees and costs
13 in connection with the seizure, retention and return of the
14 defendant currency.

15 DATED: 5/20, 2015

PHILIP S. GUTIERREZ
THE HONORABLE PHILIP S. GUTIERREZ
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 STEPHANIE YONEKURA

3 Acting United States Attorney

4 ROBERT E. DUGDALE

5 Assistant United States Attorney
6 Chief, Criminal Division

7 /s/ Steven R. Welk

8 STEVEN R. WELK

9 Assistant United States Attorney
10 Chief, Asset Forfeiture Section

11 Attorneys for Plaintiff

12 United States of America